RCRA Inspection Report

1) Inspectors and Authors of Report

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2) Facility Information

Aerospace Coatings International, LLC
370 Knight Drive
Oxford, Alabama 36203
Talladega County
EPA ID: ALR000026872

3) Responsible Official

Anthony Landingham, Safety and Environmental Manager

4) Inspection Participants

Anthony Landingham	Aerospace Coatings International, LLC
Jonah Harris	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

June 25, 2019 at 10:10 a.m. CDT

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 *et seq.*; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program; however, for ease of reference, the federal citations will follow in brackets.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-11-.02(1)(a)244. [40 C.F.R. § 273.9], a "Small Quantity Handler of Universal Waste" (SQHUW) is a universal waste handler who does not accumulate 5,000 kilograms or more of universal waste (batteries, pesticides, mercury-containing equipment, or lamps, calculated collectively) at any time.

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Aerospace Coatings International, LLC, EPA ID# ALR000026872 with the applicable regulations.

8) Facility Description

Aerospace Coatings International, LLC (ACI) in Oxford, Alabama, is an aircraft maintenance, repair and overhaul repair facility that specializes in hydraulic, pneumatic and landing gear part repair.

When parts are received by ACI, they are sent to the Pre-Inspection Area. In this area, work orders are reviewed, and the parts are distributed to the Machining/Grind Shops, depending on the type of repairs needed. After the repairs have been made in the Machining/Grind Shops, the parts are sent to the Clean Prep Area. In the Clean Prep Area, the parts are cleaned with methyl ethyl ketone (MEK) prior to the plating operation. The cleaned parts are then sent to the Masking Area. In this area, masking is applied to areas of the parts that plating is not wanted. After the parts have been masked, they are sent to one of the two Plating Areas. When plating is completed, the parts are sent to the De-Masking Area. In this area, the masking is removed from the parts. After the parts have been de-masked, they are sent through the Nital Etch System. During the Nital etching process, the parts bare surfaces are exposed to a solution of nitric acid (2 to 4%) in alcohol. The etched surfaces are examined visually to detect detrimental microstructural modifications that result from overheating during improper machining or surface grinding. Once the parts are approved at the Nital Etch System, they are prepared for shipment back to the customer.

ACI has 128,000 square feet of production area. ACI employs approximately 172 employees with one employee that handles hazardous waste. The facility operates 5 days per week, 8-12 hours per day and one to two shifts.

ACI's most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated June 7, 2018, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently, ACI generates used oil, universal wastes, paint and solvent waste, and other wastes which include EPA waste codes D001, D002, D003, D006, D007, D008, D035, F006 and F007 wastes.

9) Previous Inspection History

This facility was previously last inspected on February 26, 2019 by ADEM. No violations were found during the inspection.

10) Findings

At approximately 10:10 a.m. CDT, the EPA and ADEM inspectors arrived at the ACI facility, presented their credentials to the front desk. Mr. Anthony Landingham, Safety and Environmental Manager greeted the inspectors and showed them to his office. Mr. Landingham met with the inspectors for an opening conference before escorting them around the facility. The inspectors presented their credentials to Mr. Landingham at 10:10 a.m. CDT.

At the opening conference, a brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 Staging Area

At the time of the inspection, 13 330-gallon hazardous waste totes of waste chromic acid were staged outside for pickup, scheduled for that day (Pictures 1-3). The totes were closed, labeled (D002, D007) and dated June 25, 2019. Mr. Landingham explained that he was waiting on the transporter, and that the hazardous waste chromic acid was not considered waste prior to this day, but product for reuse until ready for disposal off-site. ACI stores used chromic acid, used nickel plating, used hydrochloric acid and other used products in totes in the staging area for further reuse until ready for disposal (Picture 14). Mr. Landingham stated that liquid electroplating wastes generated at the site are placed in plastic totes and subsequently tested to determine if they meet certain specifications. Materials that meet those specifications are reused in the facility's plating operations. Materials that cannot be reused on-site are declared to be wastes and are shipped off-site for disposal.

In addition, the inspectors observed a 330-gallon tote of Zyglo, two 330-gallon totes of nickel solution and one 220-gallon tote of hydrochloric acid being stored as product for reuse (Pictures 4-5). These containers were moved outside temporarily for the hazardous waste chromic acid totes to be staged. During the inspection, the four totes of product for reuse were moved back inside to the staging area.

The inspectors entered the staging area and observed two 55-gallon satellite accumulation area (SAA) drums of spent plastic blast media contaminated with cadmium that were not closed. One of the SAA drums contained spent media and a discarded filter from the media blaster. The inspectors stated that since the contents of the drums were the same, the SAA exceeded the 55-gallon storage capacity. The inspectors advised removing one of the drums to the central accumulation area (CAA).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)6.(ii) [40 C.F.R. § 262.15(a)(6)(ii)(A)], which is a condition of the SAA Permit Exemption, to remove the excess from the satellite accumulation area within three consecutive calendar days to a central accumulation area operated in accordance with the applicable regulations in §262.16(b) or §262.17(a).

Spent blast media contaminated with cadmium was observed on the floor and the media blaster (Pictures 6-13). Mr. Landingham stated that housekeeping was ongoing and that the personnel assigned to the area would be back to sweep up the spent media.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(2) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

10.2 Plating Room

The Plating Room in the Outer Diameter (OD) Shop provides nickel, chromium, copper, cadmium, silver, magnesium phospate and black oxide plating depending on client specifications. The different plating solutions are in small vats sitting on secondary containment. This plating room is used specifically for small aircraft parts. The inspectors observed a non-hazardous drum of nickel contaminated personal protective equipment (PPE) waste, a spill kit, the black oxide tank with visible corrosion on the surface, a 55-gallon SAA drum of chromic acid contaminated PPE that was not closed and the secondary containment pallet with overflow (Pictures 15-20). The inspectors recommended that the secondary containment be kept clean.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

10.3 OD Shop Plating Prep Shop

The Plating Prep Shop receives the incoming parts, cleans them of oil, grease and tape with methyl ethyl ketone (MEK) in small vats, and tapes up the areas of the part not to be plated. The inspectors observed the clean MEK in small red vats (Picture 21). Mr. Landingham explained that the dirty MEK is not reused but drummed and discarded as hazardous waste.

The Chrome Plating Room is located beside the Plating Prep Shop. The entire room is specifically for chrome plating of small aircraft parts. The inspectors observed an eyewash and shower, two red SAA step cans of chromic acid contaminated PPE, a 55-gallon SAA drum of chromic acid contaminated PPE and a 55-gallon drum of discarded chromic acid lab sample bottles (Pictures 22-24, 26-27). Mr. Landingham explained that the step cans once filled are emptied into the 55-gallon drum. The inspectors stated that SAA to SAA transfer is not permitted.

At the time of the inspection, the facility had released chromic acid into the secondary containment to conduct repairs to the process (Picture 25). The released chromic acid was being pumped into a 330-gallon tote for reuse (Picture 34).

The inspectors returned to the Plating Prep Shop and observed the media blaster and the attached baghouse hopper (Pictures 28-30). The 55-gallon SAA drum underneath the hopper was closed and labeled. No media was observed on the floor. Next to the hopper was a HEPA vacuum that was not labeled and a 55-gallon SAA drum of chromium contaminated debris (Pictures 31-33). Mr. Landingham explained that the HEPA vacuum was used specifically for the media blaster area and currently contained spent blast media. Based on the observations made during the inspection, the HEPA vacuum was a hazardous waste SAA container. The container was not marked or labeled with a hazardous waste label indicating the contents.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5 [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

10.4 OD Shop

The OD Shop provides machining for the outer diameter of small aircraft parts. The inspectors observed a 55-gallon SAA drum of hazardous coolant sludge on a portable secondary containment (Pictures 35, 36, 39). The drum exterior and secondary containment was covered in coolant sludge. A second 55-gallon SAA drum of hazardous coolant sludge also had coolant sludge on the drum exterior (Pictures 43-45).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(2) [40 C.F.R. § 262.251], and is a condition of the LQG Permit Exemption, a generator is required to maintain and operate its facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

During the inspection, the floor grates were filled with used coolant product that contained hydraulic oil, coolant and water. The OD Shop personnel explained that an OD grinder had been pumped out

and the used coolant product was released to the floor grate (Pictures 37-38, 40-42). A small pump and a 330-gallon tote were in place to pump up the used coolant product (hydraulic oil, coolant and water). At the time of the inspection, Mr. Landingham stated the personnel would test the released used coolant product to determine if the used coolant product was reusable or to be discarded.

Another area of the OD Shop was the OD grinder for the landing strip gear. This area was not in operation at the time of the inspection. The inspectors observed releases of used coolant product under the machinery draining to the floor grate. The inspectors also noted that the floor grate was over half full of used coolant product (hydraulic oil, coolant and water) (Pictures 46-49). The inspectors explained that leaving the used coolant product in the floor grate was storage and the used coolant product needed to be cleaned out of the floor grate.

In follow up emails dated July 15-16, 2019, the inspectors asked for clarification of the reuse and disposal of the used coolant product. Mr. Landingham explained that the used coolant is not reused but collected in a 330-gallon tote and stored for disposal. Based on the information, Mr. Landingham provided via email, the inspectors determined that the floor grate was being used for long term storage. Thus, the floor grate and sump are considered a storage tank.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10 [40 C.F.R. Part 265, Subpart J], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems is required to comply with the applicable requirements of ADEM Admin. Code r. 335-14-6-.10 [40 C.F.R. Part 265, Subpart J], except ADEM Admin. Code r. 335-14-6-.10(8) [40 C.F.R § 265.197(c)] (closure and post-closure care) and ADEM Admin. Code r. 335-14-6-.10(11) [40 C.F.R § 265.200] (waste analysis and trial tests).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(4) [40 C.F.R. § 265.193], and is a condition of the LQG Permit Exemption, a generator must meet the tank secondary containment requirements.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(6) [40 C.F.R. § 265.195(e)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must conduct daily inspections of tank ancillary equipment that is not provided with secondary containment.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(ii) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words "Hazardous Waste"; mark or label its tanks with an indication of the hazards of the contents; use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank; and keep inventory logs or records with the above information on site and readily available for inspection.

The Shot Peen media blaster was in the OD Shop. This media blaster was self-contained, and no spent media was observed on the floor. However, the 5-gallon SAA container used to capture the

spent blast media was not labeled, but the 55-gallon SAA drum of spent blast media from the Shot Peen media blaster was labeled as hazardous waste (Pictures 50-53).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5 [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

10.5 Stripper Shop

The Stripper Shop is a separate building that contains vats of sodium hydroxide and hydrochloric acid rinses. The inspectors observed the concrete tank underneath the floor grate was over half full of overflowed spent acid rinse (Pictures 54-56). ACI has determined that the spent acid rinse is a hazardous waste. According to Mr. Landingham, the hazardous spent acid rinse has been accumulating in the concrete tank for over 24 hours. The inspectors stated that the concrete tank needed to be pumped out. The concrete tank was not labeled with the words "Hazardous Waste" and was not being inspected daily.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10 [40 C.F.R. Part 265, Subpart J], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems is required to comply with the applicable requirements of ADEM Admin. Code r. 335-14-6-.10 [40 C.F.R. Part 265, Subpart J], except ADEM Admin. Code r. 335-14-6-.10(8) [40 C.F.R § 265.197(c)] (closure and post-closure care) and ADEM Admin. Code r. 335-14-6-.10(11) [40 C.F.R § 265.200] (waste analysis and trial tests).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(4) [40 C.F.R. § 265.193], and is a condition of the LQG Permit Exemption, a generator must meet the tank secondary containment requirements.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(6) [40 C.F.R. § 265.195(e)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must conduct daily inspections of tank ancillary equipment that is not provided with secondary containment.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(ii) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words "Hazardous Waste"; mark or label its tanks with an indication of the hazards of the contents; use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank; and keep inventory logs or records with the above information on site and readily available for inspection.

10.6 Plasma Dust Collector

The Plasma Dust Collector hopper and drum are located outside the main building. The hopper collects the overspray of powdered metal coating applied to the steel. Using generator knowledge

ACI has determined the dust to be non-hazardous waste (Picture 57). Near the Plasma Dust Collector were two general dust collection hoppers and drums (Pictures 58, 60). Using generator knowledge, ACI has determined this dust is also a non-hazardous waste. The inspectors stated that due to the variability of the facility operations a waste analyses should be done on the dust collected prior to disposal.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(2) [40 C.F.R. § 262.11], a person who generates a solid waste, as defined in ADEM Admin. Code r. 335-14-2-.01(2) [40 C.F.R. § 261.2], must make an accurate determination as to whether that waste is a hazardous waste in order to ensure wastes are properly managed according to applicable RCRA regulations.

The inspectors also observed four lead acid batteries on a pallet near one of the dust collectors (Picture 59). Maintenance personnel explained that the batteries were new and had been moved out of the old maintenance shop during clean up. The personnel used a forklift to take the batteries into the new maintenance shop.

10.7 ID Shop

The Inner Diameter (ID) Shop provides machining for the inner diameter of small aircraft parts. At the rear of the shop is the Paint Booth. The inspectors observed inside the paint booth was a 55-gallon SAA drum of paint waste debris that was not closed (Pictures 61-63). However, the paint technician was working in the shop at the time of the inspection but left while the inspectors were walking around the paint booth. Mr. Landingham immediately closed the container when the technician left. Mr. Landingham also explained that the paint booth filters when discarded are shipped off as hazardous waste.

The inspectors toured the ID Shop and observed one 55-gallon SAA drum of chromic debris, an Alodine dip station and the floor grate half full of used coolant product (hydraulic oil, coolant and water). At the time of the inspection, Mr. Landingham stated the personnel would pump out the floor grate and then determine if the used coolant product was reusable or to be discarded. The inspectors explained that leaving the used coolant product (hydraulic oil, coolant and water) in the floor grate was storage and the used coolant product needed to be cleaned out of the floor grating.

In follow up emails dated July 15-16, 2019, the inspectors asked for clarification of the reuse and disposal of the used coolant product. Mr. Landingham explained that the used coolant is not reused but collected in a 330-gallon tote and stored for disposal. Based on the information, Mr. Landingham provided via email, the inspectors determined that the floor grate was being used for long term storage. Thus, the floor grate and sump are considered a storage tank.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10 [40 C.F.R. Part 265, Subpart J], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tank systems is required to comply with the applicable requirements of ADEM Admin. Code r. 335-14-6-.10 [40 C.F.R. Part 265, Subpart J], except ADEM Admin. Code r. 335-14-6-.10(8) [40 C.F.R § 265.197(c)] (closure and post-closure care) and ADEM Admin. Code r. 335-14-6-.10(11) [40 C.F.R § 265.200] (waste analysis and trial tests).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which

incorporates ADEM Admin. Code r. 335-14-6-.10(4) [40 C.F.R. § 265.193], and is a condition of the LQG Permit Exemption, a generator must meet the tank secondary containment requirements.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)2. [40 C.F.R. § 262.17(a)(2)], which incorporates ADEM Admin. Code r. 335-14-6-.10(6) [40 C.F.R. § 265.195(e)], and is a condition of the LQG Permit Exemption, a generator accumulating hazardous waste in tanks must conduct daily inspections of tank ancillary equipment that is not provided with secondary containment.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(ii) [40 C.F.R. § 262.17(a)(5)(ii)], which is a condition of the LQG Permit Exemption, a generator must mark or label its tanks with the words "Hazardous Waste"; mark or label its tanks with an indication of the hazards of the contents; use inventory logs, monitoring equipment or other records to demonstrate that hazardous waste has been emptied within 90 days of first entering the tank; and keep inventory logs or records with the above information on site and readily available for inspection.

Outside the Paint Booth on a cart were seven fluorescent lamps (Pictures 66-67). The paint technician confirmed that the lamps were spent and were left by maintenance during a lamp change out.

Pursuant ADEM Admin. Code r. 335-14-11-.02(4)(d) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

Pursuant to ADEM Admin. Code r. 335-14-11-.02(5)(e) [40 C.F.R. § 273.14(e)], a SQHUW must label or mark each lamp or container of lamps clearly with one of the following phrases: "Universal Waste-Lamp(s)," or "Waste Lamp(s)," or "Used Lamps."

10.8 Maintenance

The old maintenance shop is located upstairs of the OD Shop. The Maintenance Shop consisted of storage, the Honing Shop, and the Plasma Spray Shop. The universal waste lamps are stored in this area. The inspectors observed that the universal waste lamps are kept in two wooden boxes attached overhead on the wall (Pictures 68-73). Both boxes were labeled, not closed, and had the wrong dates on the labels. Mr. Landingham marked out the incorrect date and stated he could provide documentation of the previous universal waste lamp shipment in January 2019.

Pursuant ADEM Admin. Code r. 335-14-11-.02(4)(d) [40 C.F.R. § 273.13(d)], a SQHUW must manage universal waste lamps in a way that prevents releases of any universal waste or component of a universal waste to the environment.

The Honing Shop rubs abrasive material out of the aircraft parts using stones, giving the parts a fine finish. The shop had two MEK tanks to clean the oil and grease off the parts and six 55-gallon non-hazardous waste drums of Plasma Spray blast media, screens and insulation blankets.

The Plasma Spray Shop cleans the parts with MEK, media blasts the parts and then powder coats

with a nickel rich metal coating. The shop had two MEK tanks, a media blaster with non-hazardous blast media, and two plasma spray paint booths. The paint booth applies powdered metal using high velocity oxygen flame that melts the metal coating which adheres to the parts. The paint booths have an external dust collector that captures the overspray. As mentioned earlier, because of the metal mixture in the coating the dust collected needs to be analyzed for hazardous constituents.

On the landing outside the maintenance shop is a media blaster, a yellow flammable cabinet with a 55-gallon SAA drum of waste MEK and an eye wash. The 55-gallon SAA drum bungs were not closed, and a funnel was sitting on top of the drum not attached (Pictures 74-76).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

10.9 Landing Gear Shop

The Landing Gear Shop was a separate building that specialized in landing gear repair. The inspectors toured the shop and observed an aluminum oxide media blaster with two 55-gallon SAA drums of spent blast media (Pictures 77-80). One drum was attached to the media blaster hopper and the second drum was sitting in front of the hopper and not closed.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)4 [40 C.F.R. § 262.15(a)(4)], which is a condition of the SAA Permit Exemption, a generator is required to keep containers of hazardous waste closed at all times during accumulation, except when adding, removing, or consolidating waste; or when temporary venting of a container is necessary for the proper operation of equipment, or to prevent dangerous situations, such as build-up of extreme pressure.

The shop also had a plating room offering multiple plating dip tanks per client request and a scrubber room with a floor grate filled with rinse water to be pumped out and reused (Picture 81).

10.10 Central Accumulation Area

The CAA is a separate building located near the staging area. The inspectors observed six 55-gallon drums of chromic waste with the oldest dated May 28, 2019 (Pictures 82-83); two 55-gallon drums of used oil, CimCool coolant and water; six 55-gallon drum of MEK waste with the oldest dated May 28, 2019 (Picture 84); and one 55-gallon drum of paint waste dated June 24, 2019.

One chromic waste drum and one MEK waste drum were not dated. Mr. Landingham immediately added the dates from his CAA log. All drums were on secondary containment. The entrance was secured and the appropriate signage (Picture 85).

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)5.(i) [40 C.F.R. § 262.17(a)(5)(i)], which is a condition of the LQG Permit Exemption, a generator must mark or label its containers with the following: the words "Hazardous Waste"; an indication of the hazards of the contents; and the date upon which each period of accumulation begins clearly visible for

inspection on each container.

10.11 Lab

The lab collects samples from the plating dip tanks and analyzes them for formulation and quality. The inspectors observed a 30-gallon SAA drum of discarded PPE and contaminated debris, a cabinet containing chromic waste storage area and a one-gallon jar of ferrous ammonium sulfate chemical waste from titration (Pictures 86-93).

The cabinet was underneath a counter and contained two white 5-gallon SAA totes of chromic acid waste, a 1.5-liter SAA container of chromic waste and two 1.5-liter containers of non-hazardous waste. The remaining containers were raw materials. The 1.5-liter container of chromic waste was not labeled.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a)5 [40 C.F.R. § 262.15(a)(5)], which is a condition of the SAA Permit Exemption, a generator is required to mark or label its containers (i) with the words "Hazardous Waste" and (ii) with an indication of the hazards of the contents.

Records Review

The inspectors requested the training records, the contingency plan, the weekly inspection records, the waste profiles, weekly inspection logs, the 2018-2019 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated June 7, 2018.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Tony Landingham and Calon Fleming were provided. Mr. Landingham and Mr. Fleming were provided Hazardous Communication and RCRA Hazardous Waste online training by ACI Initial/Recurrent RCRA Hazardous Waste Management Training on March 15, 2018 and March 21, 2019, and May 25, 2018 and May 29, 2019, respectively. The job titles and descriptions were in their training records. However, Mr. Fleming's job description for Maintenance II and Millwright I/II did not include hazardous waste duties.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)7. [40 C.F.R. § 262.17(a)(7)(iv)], which is a condition of the LQG Permit Exemption, the generator must maintain training records that include, among others: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position; a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position; and records documenting that the training required has been given to and completed by Facility personnel.

The inspectors requested the contingency plan revised on November 12, 2018, for review. The plan included an emergency contact list, a current evacuation map, a fire extinguisher inspection list, and a list of emergency response equipment. However, documentation (i.e., green return receipt cards, emails) that copies of the contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital) was not available.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(7) [40 C.F.R. § 262.256(b)], and is a

condition of the LQG Permit Exemption, a generator must maintain records documenting the arrangements made.

In addition, the updated regulation under the Generator Improvement Rule, requires that the generator amending its contingency plan submit a Quick Reference Guide of the contingency plan to the local emergency responders to have the following information:

(1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);
(2) The estimated maximum amount of each hazardous waste that may be present at any one time;
(3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;
(4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;
(5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;
(6) The locations of water supply (e.g., fire hydrant and its flow rate);
(7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
(8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

At the time, of the inspection, the current contingency plan had been updated after May 2017, and the Quick Reference Guide was not available at this time.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)6. [40 C.F.R. § 262.17(a)(6)], which incorporates ADEM Admin. Code r. 334-14-3-.14(10) [40 C.F.R. § 262.262(b)(1-8)], and is a condition of the LQG Permit Exemption, a generator amending its contingency plan submit a Quick Reference Guide of the contingency plan to the local emergency responders.

The inspectors reviewed the weekly inspection records for 2018-2019 for the facility. The inspectors observed that the time the inspections were conducted was not included.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7)(a)1.(v) [40 C.F.R. § 262.17(a)(1)], which incorporates ADEM Admin. Code r. 335-14-6.02(6)(d) [40 C.F.R. § 265.15(d)] and is a condition of the LQG Permit Exemption, a generator is required to record inspections in an inspection log or summary. He must keep these records for at least three years from the date of inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions.

Hazardous and non-hazardous manifests were reviewed for 2017-2019. Hazardous and universal wastes and used oil were shipped to the following facilities:

- Inmetco Corporation (EPA ID PAD087561015) in Ellwood City, PA;
- EQ Detroit (EPA ID MID980991566) in Detroit, MI;

- Alpha and Omega Recycling, Inc. (EPA ID TXD981514383) in Longview, TX;
- Evoque Water Technologies LLC (EPA ID MND 981098478) in Roseville, MN;
- Lighting Resources LLC Sierra Chemical in Hoover, AL; and
- Advanced Disposal Cedar Hill Landfill in Ragland, AL.

The land disposal restriction forms were reviewed.

11) Summary

The inspectors conducted the exit meeting with Mr. Landingham. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Aerospace Coatings International, LLC was inspected as a large quantity generator of hazardous waste, the facility appeared to be deficient with some requirements of RCRA.

On June 28, 2019, Mr. Landingham sent the following email with photographs to the inspectors:

See below for the list of concerns and the corrective actions and corresponding photos are on attached PowerPoint:

1. *8 Satellite accumulation containers was not closed correctly (ring not correctly on a blast media drums/ bung not in a drum of MEK in the flammable cabinet, had a drum funnel in it/latching mechanism was sprung on a latching drum lid) (Corrective action was replacing the lids with snap down lids)*
2. *3 Satellite accumulation containers were not labeled with the words "Hazardous Waste" (HEPA Vac./Shot Peen attached container/Lab had a couple of containers labels Titration Waste and Chemical Waste instead of Hazardous Waste)*
3. *Greater than 55 gallons of waste were being accumulated in a single satellite accumulation area (Had 2 55 gal. drums of at a blaster; 1 for blast media and 1 for filters. Consolidated them into 1 drum and attached a new lid too)*
4. *Waste was not adequately contained in 3 satellite containers (had sludge residue on the side of 3 CNC paper satellite drums; cleaned the drums)*
5. *Universal waste lamps in 2 areas were not placed in closed containers (Maintenance was changing lamps outside the paint booth and had them lying on a cart instead of a closed container/Universal Waste Lamp Staging Box did not have a lid on one end of it, Maintenance has built a lid and is in place)*
6. *Waste should not be moved from one satellite container to another (2 small accumulation drums were staged in the Chrome Tank room and were being dumped into a 55 gal. drum in the center of the room. The 2 small drums were removed)*
7. *Floor drains should be emptied regularly (oil and coolant from OD grinders runs off into a floor drain adjacent to them (emptied the floor drain into a tote and placed a log on the tote to insure that it is emptied on a regular basis)*
8. *Weekly Satellite and Accumulation Point Inspection Form does not include the time of the inspection (Incorporated a space to include the time of the inspection beside the date of the inspection)*
9. *The Contingency Plan did not include a quick reference guide (Quick Reference Guide was incorporated in the Contingency Plan, it was sent out to all the applicable response agencies)*
10. *Records that the Contingency Plan was delivered to local emergency response agencies was not available for review (Read receipts and email can be fought on slide 15)*

11. Calon Fleming's Job Description was updated to reflect the RCRA/HazMat/HazWoper Training he has received

12) Signed

Paula A Whiting

Paula A. Whiting
Environmental Engineer

Date

Concurrence

Alan A. Annicella,
Chief
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch

Date

ATTACHMENT A

AEROSPACE COATINGS INTERNATIONAL, LLC

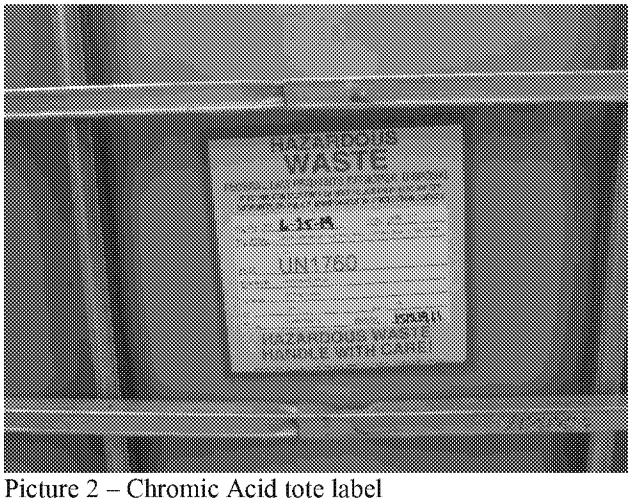
OXFORD, ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

June 25, 2019

Photos taken by Paula A. Whiting
Camera Type: Olympus Tough
Serial Number: SC7374

Picture 1 – Staging Area for Chromic Acid totes

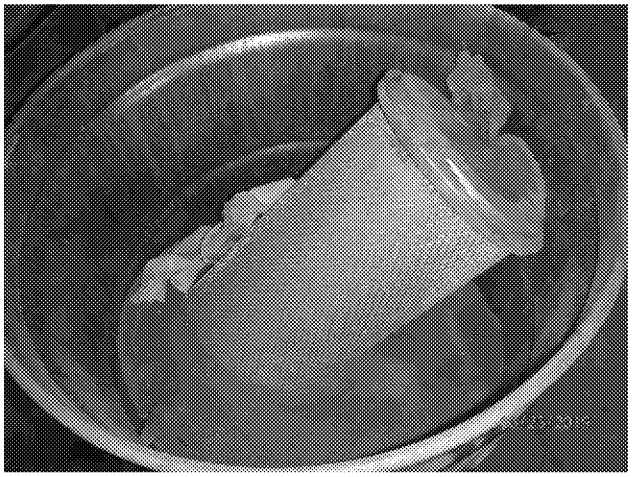


Picture 2 – Chromic Acid tote label

Picture 3 – Chromic Acid tote

Picture 4 – Staging Area process materials for reuse

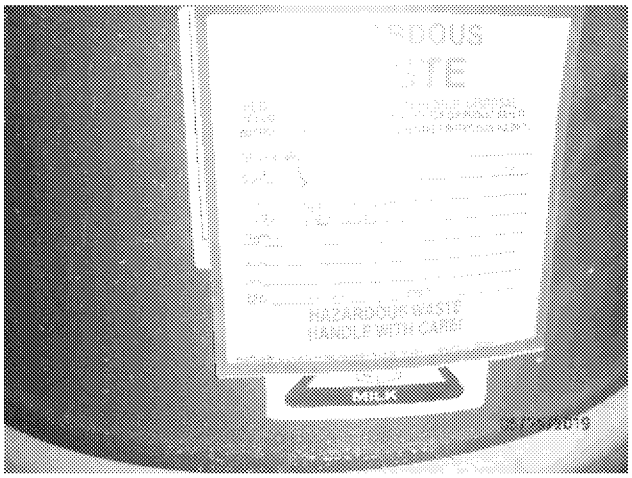
Picture 5 – Staging Area process materials for reuse



Picture 6 – Staging spent blast media with used filter

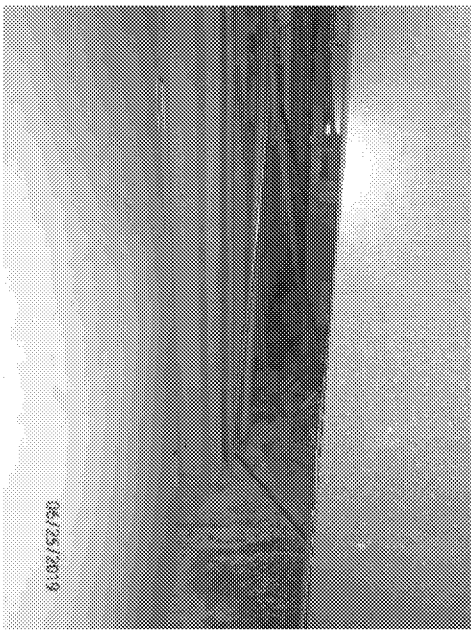
Picture 7 – Staging Area Media Blaster

Picture 8 – Staging Area spent blast media label

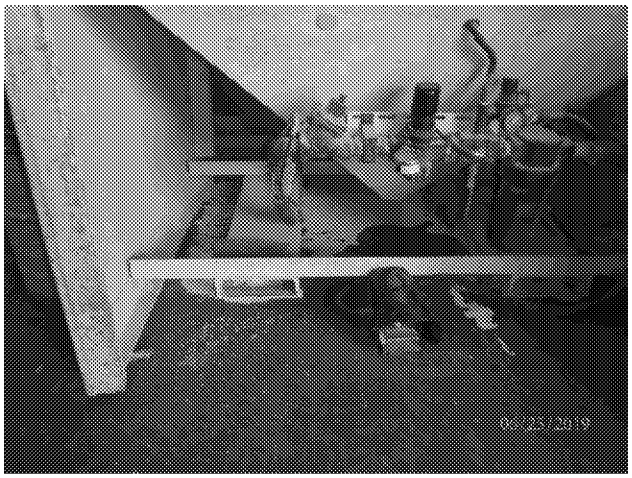


Picture 9 – Staging Area spent blast media label

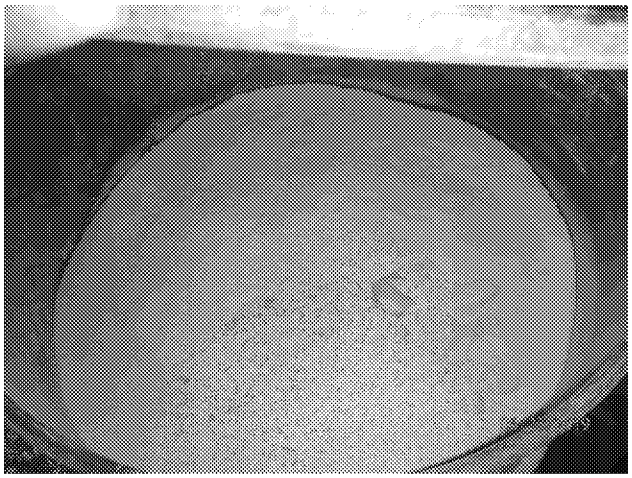
Picture 10 – Staging Area spent blast media on the ground



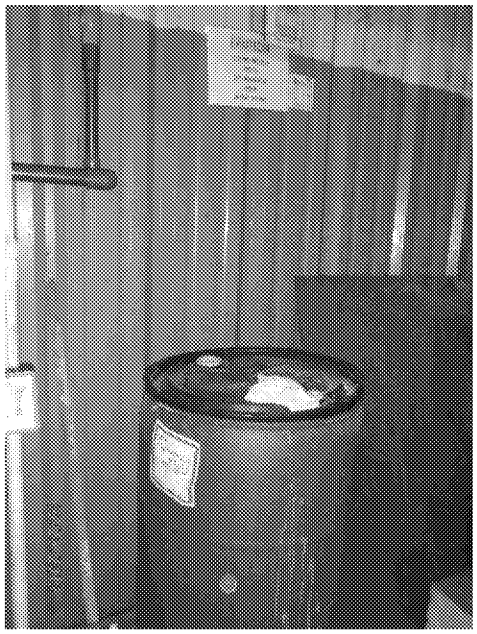
Picture 11 – Staging Area spent blast media on the ground

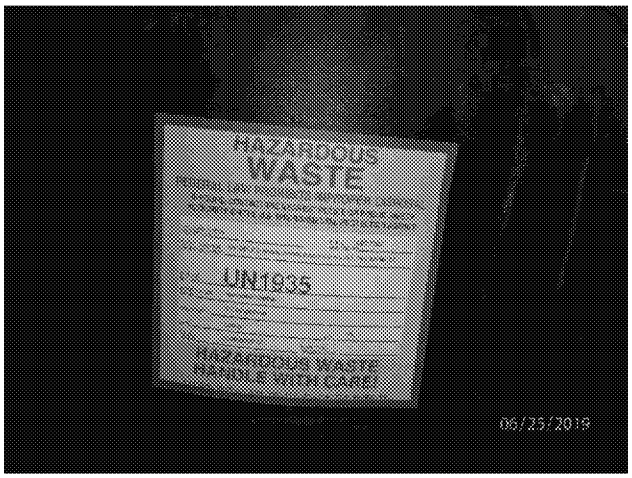


Picture 12 – Staging Area spent blast media on the ground

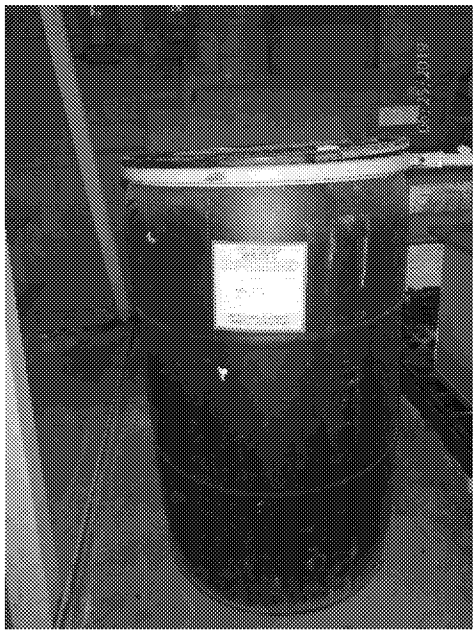

Picture 13 – Staging Area spent blast media


Picture 14 – Staging Area for process materials for reuse


Picture 15 – Plating Room non-HW nickel PPE waste

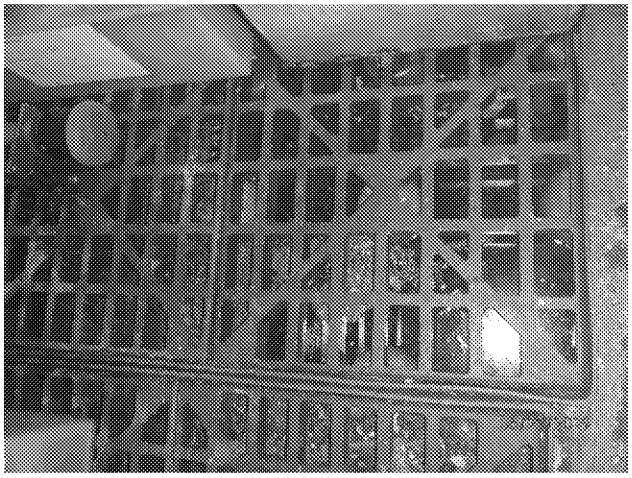


Picture 16 – Plating Room HW PPE SAA label

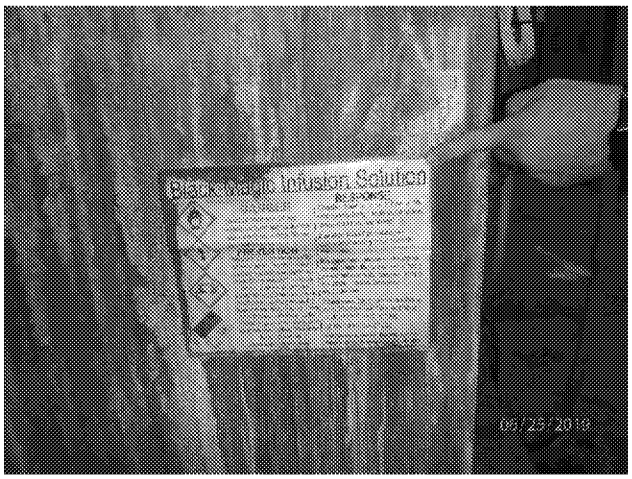


Picture 17 – Plating Room HW PPE SAA drum

Picture 18 – Plating Room HW PPE SAA



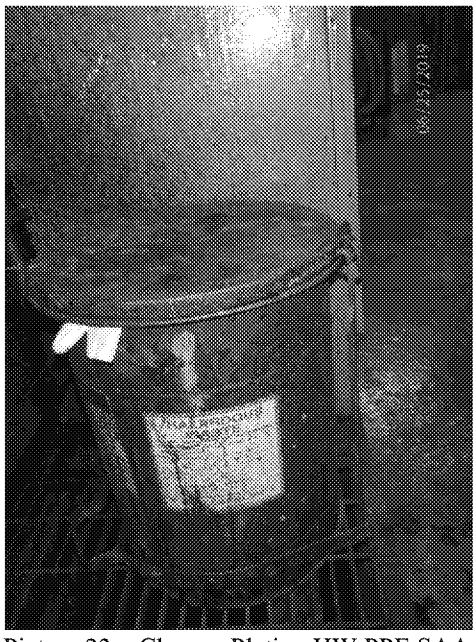
Picture 19 – Plating Room chromic acid secondary containment



Picture 20 – Plating Room Black Oxide tank

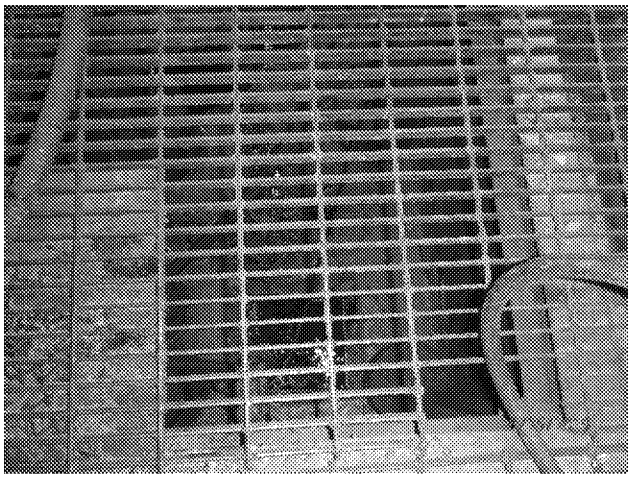
Picture 21 – Plating Prep Shop MEK vats

Picture 22 – Chrome Plating HW PPE SAA



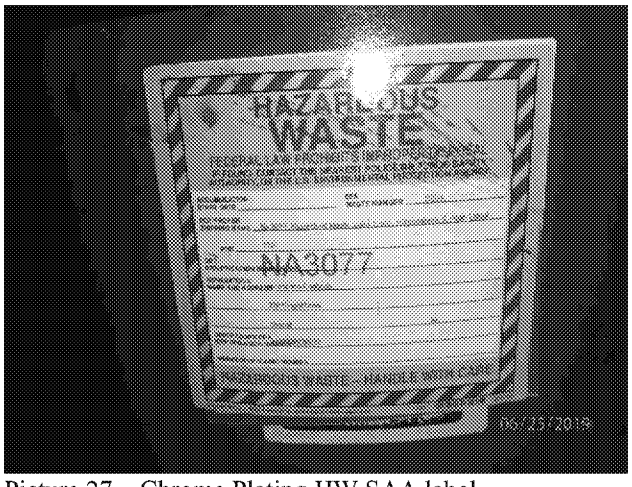
Picture 23 – Chrome Plating HW PPE SAA

Picture 24 – Chrome Plating HW PPE SAA

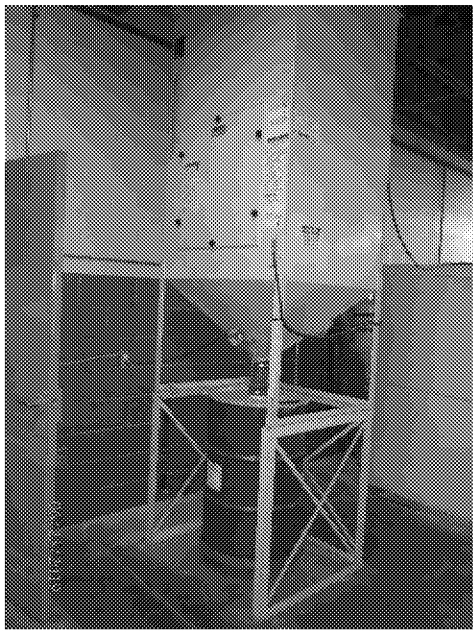


Picture 25 – Chrome Plating release to sump

Picture 26 – Chrome Plating HW SAA

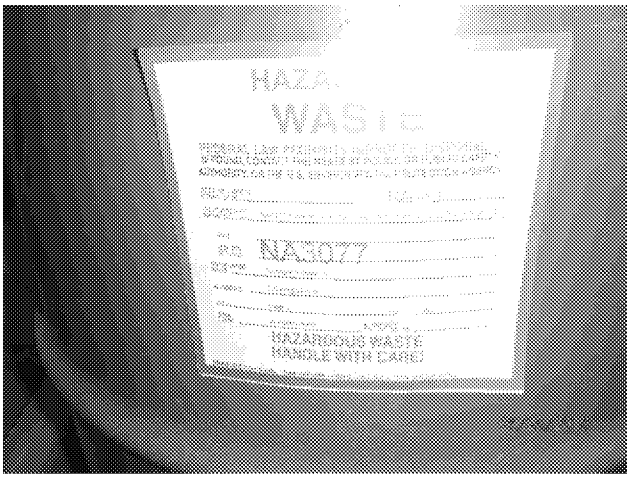


Picture 27 – Chrome Plating HW SAA label



Picture 28 – Plating Prep Shop blaster hopper and drum

Picture 29 – Plating Prep Shop blaster hopper drum



Picture 30 – Plating Prep Shop blaster hopper drum label

Picture 31 – Plating Prep Shop spent blast media SAA

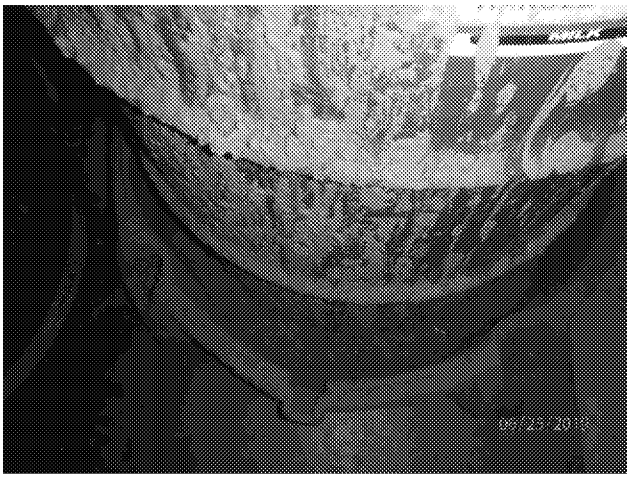
Picture 32 – Plating Prep Shop HEPA vac

Picture 33 – Plating Prep Shop HEPA vac

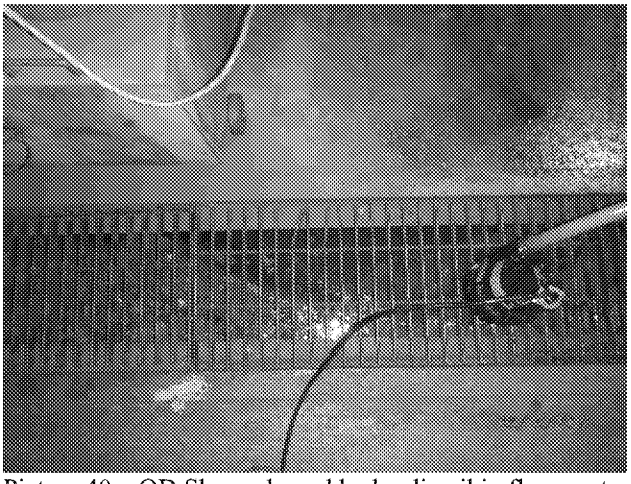
Picture 34 – Chrome Plating sump pump out tote

Picture 35 – OD Shop HW coolant sludge

Picture 36 – OD Shop HW coolant sludge label


Picture 39 – OD Shop HW coolant sludge

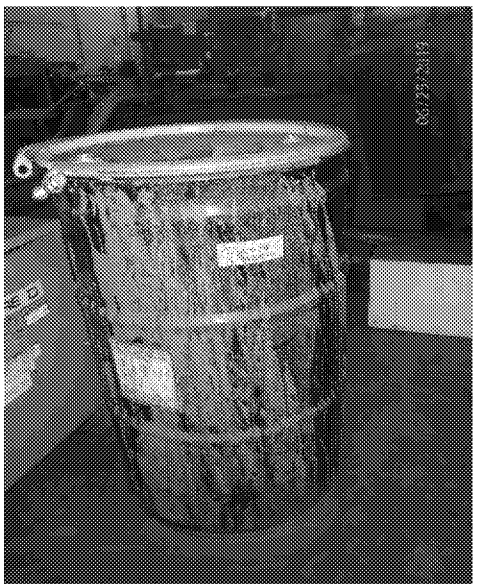

Picture 37 – OD Shop coolant and water wells


Picture 40 – OD Shop released hydraulic oil in floor grate


Picture 38 – OD Shop released hydraulic oil tote

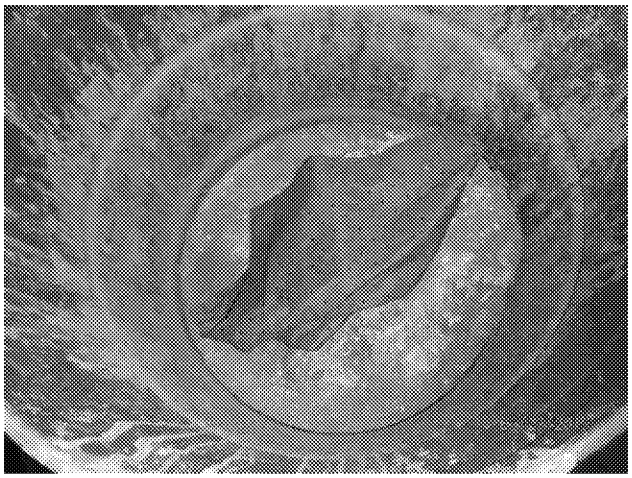

Picture 41 – OD Shop released hydraulic oil in floor grate

Picture 42 – OD Shop released hydraulic oil in floor grate

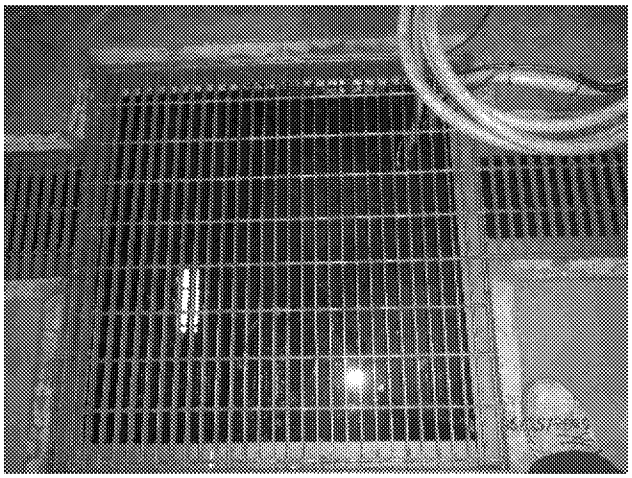


Picture 43 – OD Shop HW coolant sludge

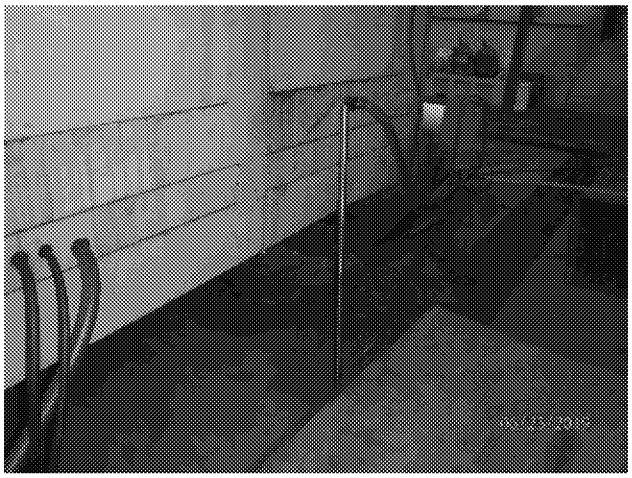
Picture 44 – OD Shop HW coolant sludge label



Picture 45 – OD Shop HW coolant sludge

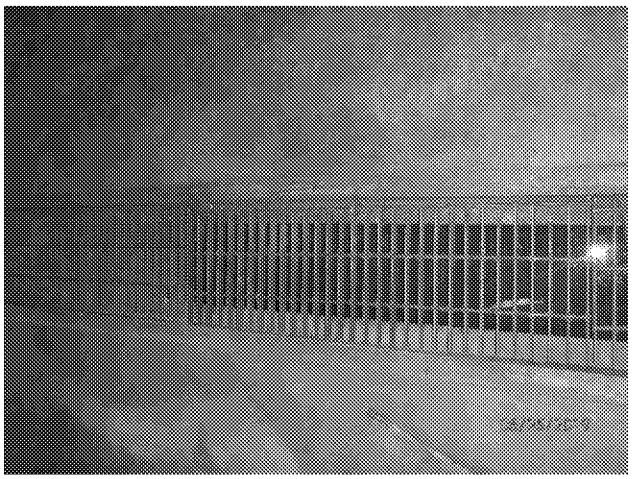


Picture 46 – OD Shop Grinder for landing gear floor grate



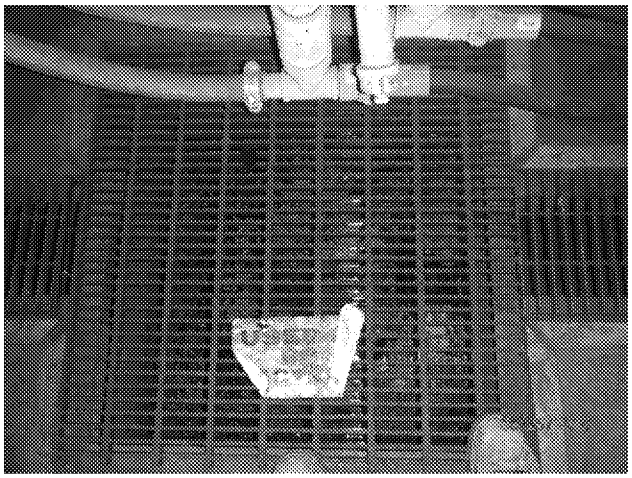
Picture 47 – OD Shop Grinder for landing gear coolant release to floor grate

Picture 48 – OD Shop Grinder for landing gear coolant release to floor grate



Picture 49 – OD Shop Grinder for landing gear coolant release to floor grate

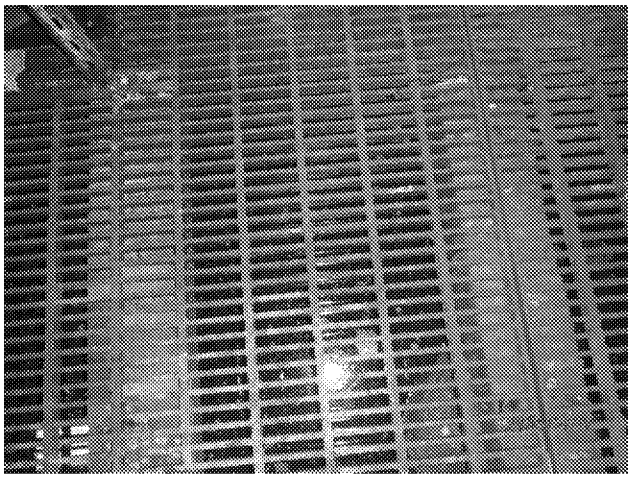
Picture 50 – OD Shop Shot Peen spent blast media



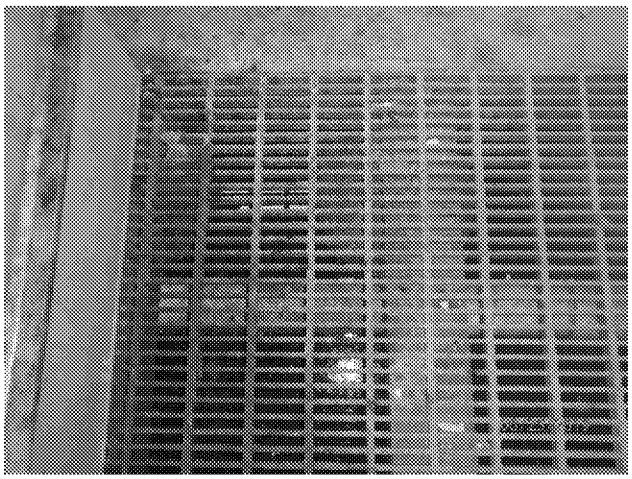
Picture 51 – OD Shop Shot Peen spent coolant to floor grate

Picture 52 – OD Shop Shot Peen spent blast media

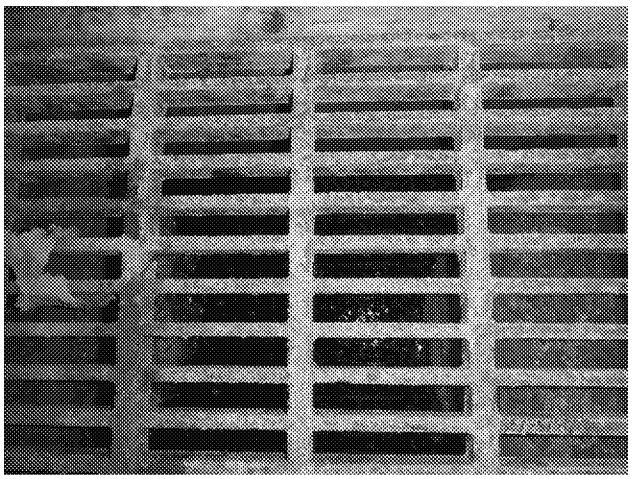
Picture 53 – OD Shop Shot Peen spent blast media label



Picture 54 – Stripper Shop floor grate filled with acidic rinse water

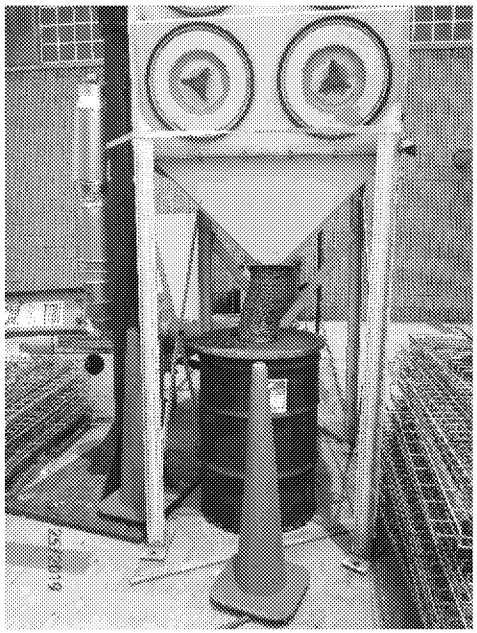


Picture 55 – Stripper Shop floor grate filled with acidic rinse water

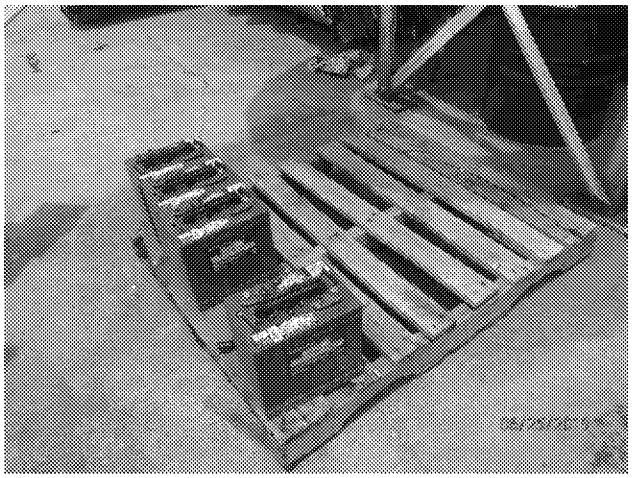


Picture 56 – Stripper Shop floor grate filled with acidic rinse water

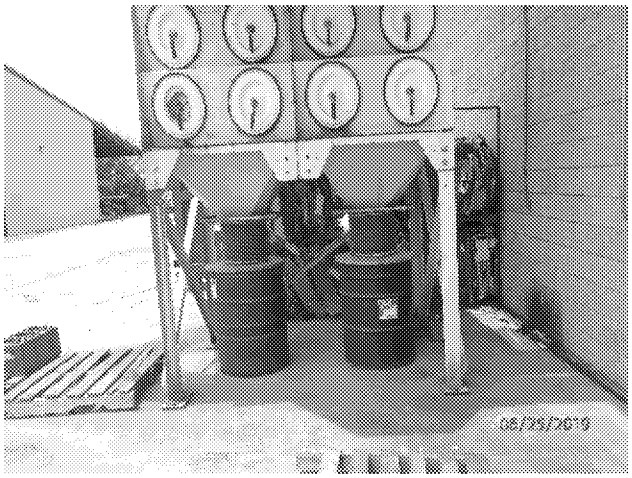
Picture 57 –Plasma Dust Collector drum



Picture 58 – General dust collector drum



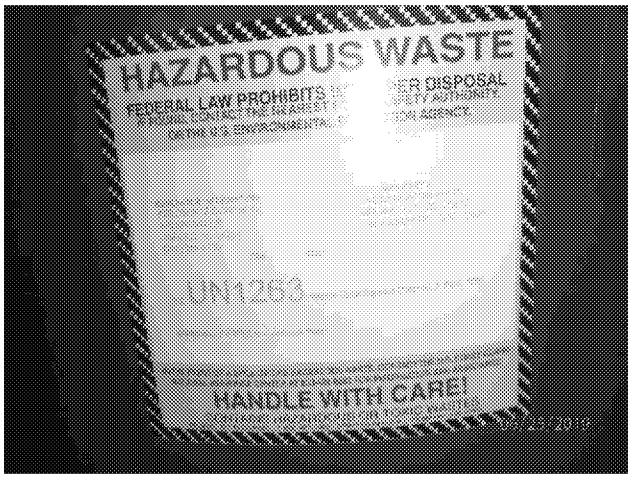
Picture 59 – Maintenance new lead acid batteries



Picture 60 – General Dust collector drums

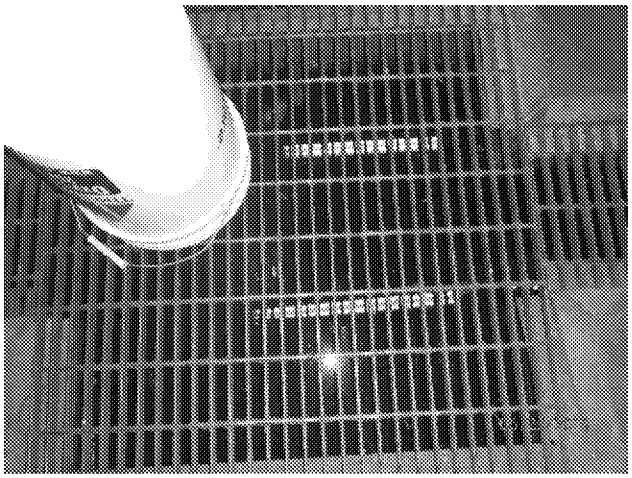
Picture 61 – ID Shop Paint Booth SAA drum

Picture 62 – ID Shop Paint Booth SAA drum



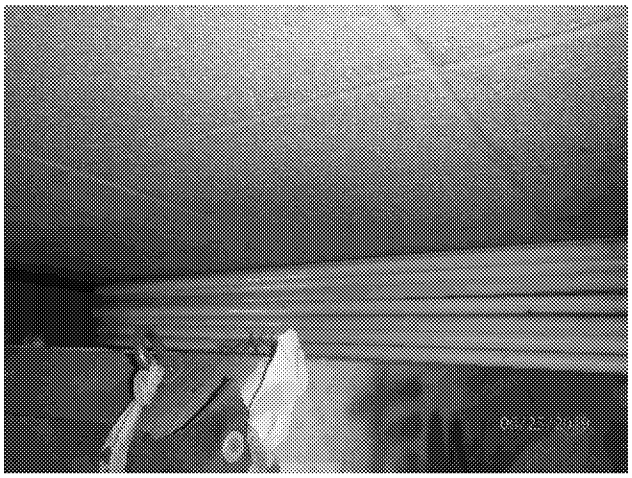
Picture 63 – ID Shop Paint Booth SAA drum label

Picture 64 – ID Shop PPE and debris SAA



Picture 65 – ID Shop floor grate sump

Picture 66 – ID Shop Paint Booth spent fluorescent lamps



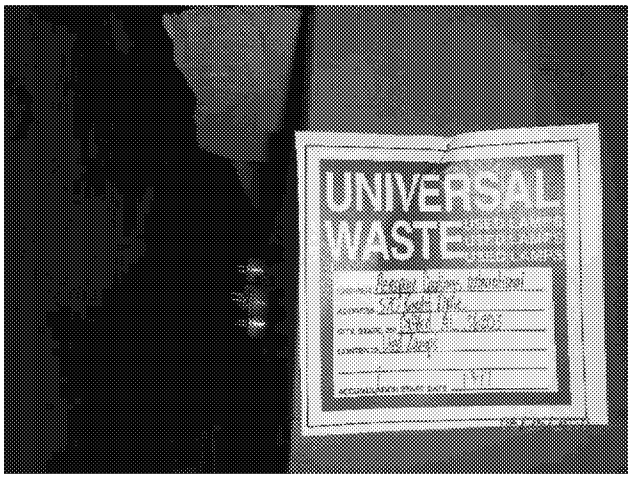
Picture 67 – ID Shop Paint Booth spent fluorescent lamps

Picture 68 – Maintenance UW Storage

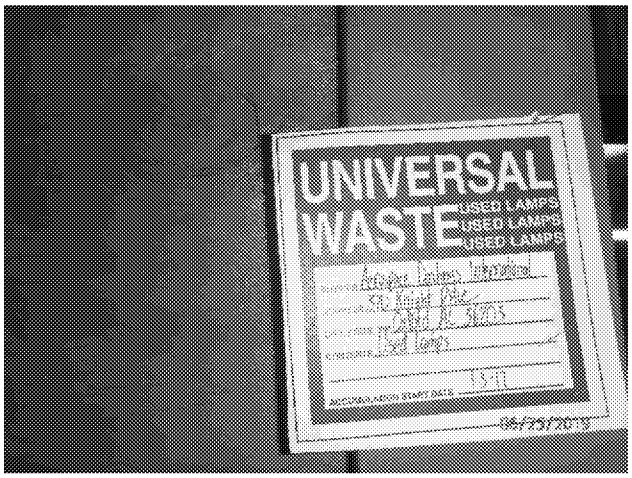
Picture 69 – Maintenance UW Storage

Picture 70 – Maintenance UW Storage

Picture 71 – Maintenance UW Storage



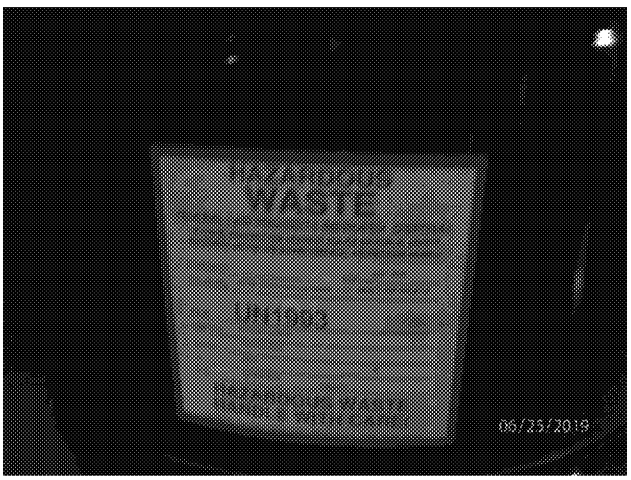
Picture 72 – Maintenance UW Storage label



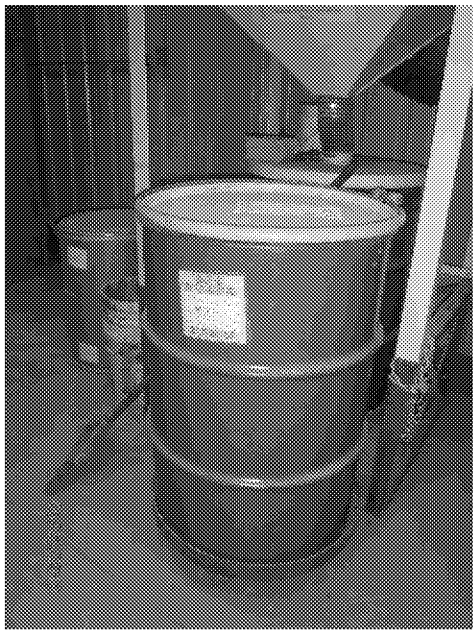
Picture 73 – Maintenance UW Storage label

Picture 74 – Maintenance HW MEK SAA

Picture 75 – Maintenance HW MEK SAA open

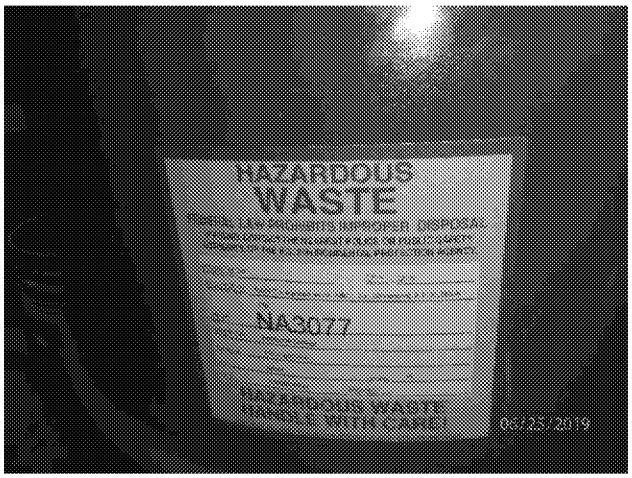


Picture 76 – Maintenance HW MEK SAA label

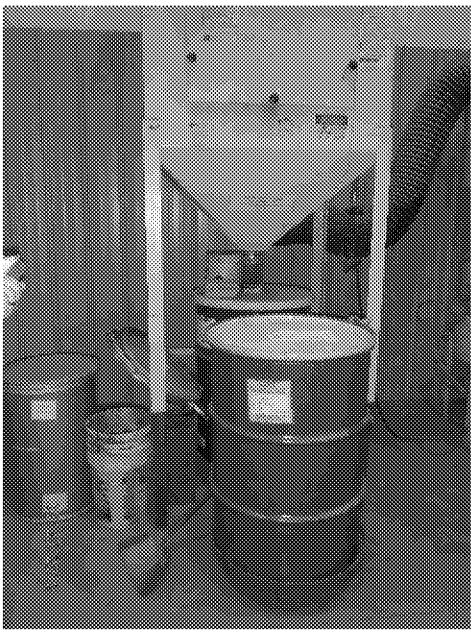


Picture 77 – Landing Gear Shop spent blast media

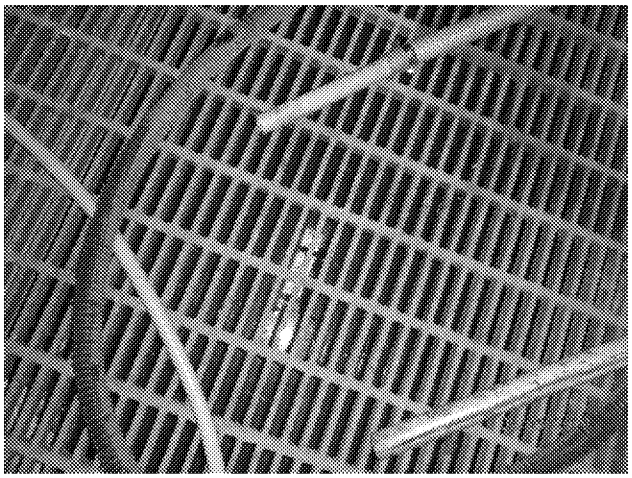
Picture 79 – Landing Gear Shop spent blast media



Picture 78 – Landing Gear Shop spent blast media label

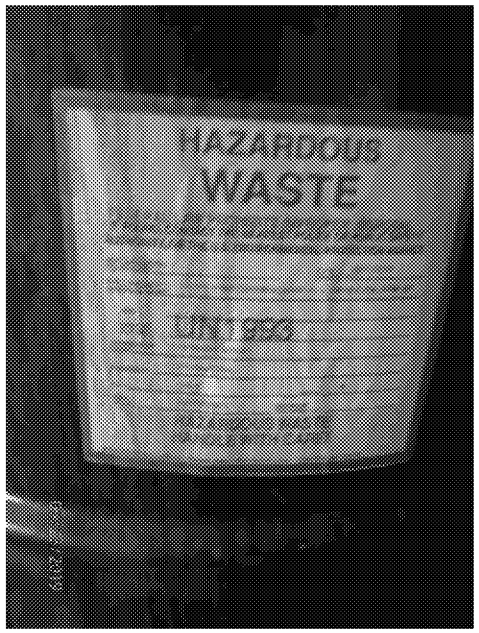


Picture 80 – Landing Gear Shop spent blast media



Picture 81 – LG Shop Scrubber Room floor grate

Picture 82 – CAA HW Chromic Acid waste drums



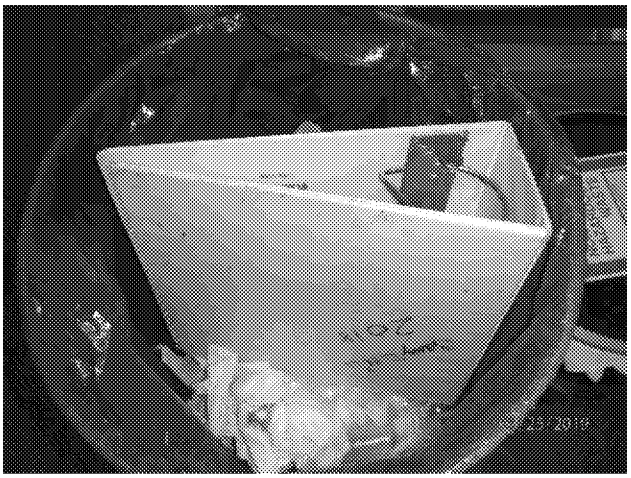
Picture 83 – CAA HW MEK waste label no date

Picture 84 – CAA HW MEK waste drums

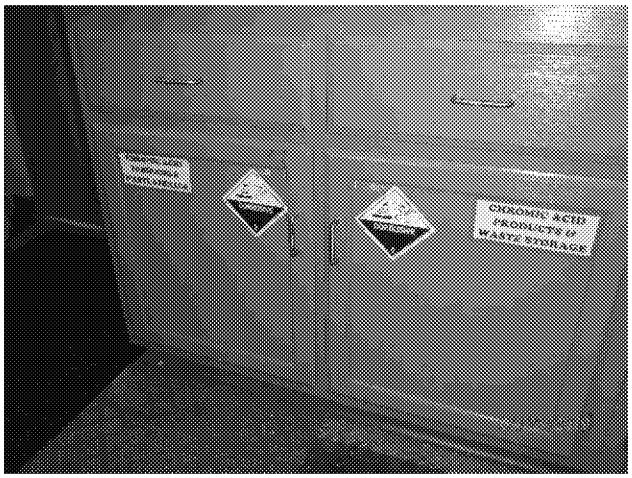
Picture 85 – CAA entrance and signs

Picture 86 – Lab chromic product and waste storage

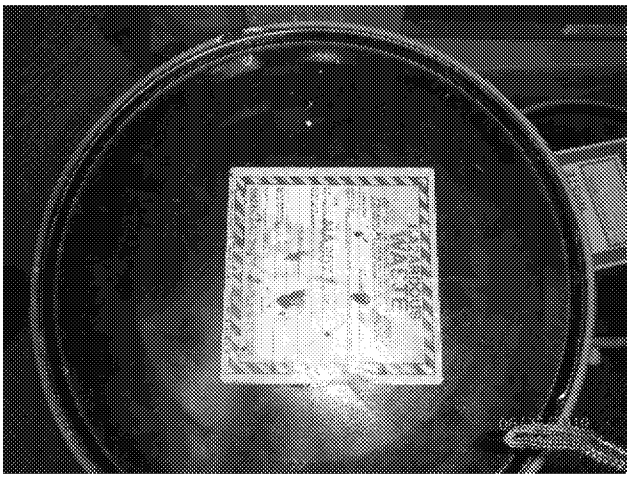
Picture 87 – Lab chromic product and waste storage



Picture 90 – Lab HW PPE and debris SAA contents



Picture 88 – Lab chromic product and waste storage



Picture 91 – Lab HW PPE and debris SAA label

Picture 89 – Lab HW PPE and debris SAA

Picture 92 – Lab chemical waste titration container

Picture 93 – Lab chemical waste titration container